

EXHIBIT E

09-06-08 02:25pm From-CURIALE DELLAVERSON, et al.

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**CURIALE DELLAVERSON HIRSCHFELD &
KRAEMER, LLP**

FACSIMILE TRANSMITTAL SHEET

DATE: June 9, 2008

To:	FAX No.:	PHONE No.:
Mark S. Askanas Dylan B. Carp JACKSON LEWIS LLP	(415) 394-9401	(415) 394-9400

FROM: Kristen L. Williams **PHONE:** (415) 835-9051
RE: Crump v. Michael P. McGrath and All Risks, LTD

CLIENT/MATTER NUMBER: 60170.002

NUMBER OF PAGES WITH COVER PAGE: 6 Originals Will Not Follow in Regular Mail

MESSAGE:

Please see attached letter with attachments.

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Dylan B. Carp, Esq.
Mark S. Askanas, Esq.
Jackson Lewis LLP
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San Francisco, CA 94105

Dear Mr. Carp:

This letter is in response to your letter of June 6, 2008 regarding numerous discovery issues. Additionally, I would like to take this opportunity to respond to additional issues that were raised in your and Mr. Askanas's emails of June 9, 2008.

Depositions of Messrs. McGrath and Cortezi

With regard the first issue you raised – the depositions of Messrs. McGrath and Cortezi, we have received your amended notices of depositions. With regard to the format of Mr. Cortezi's deposition as well as to the requests for production that accompanied his requests, I trust that you are now in receipt of our objections and responses. Thank you for drawing our attention to Mr. Cortezi's original notice of deposition that does notice the intent to use videotape. With that in mind, we no longer object to the videotaping of Mr. Cortezi's deposition.

As to the substantive discovery issues addressed in your letter, I provide the following:

Requests for Production to All Risks and McGrath

First, we will provide you with verifications as soon as possible.

Second, we have already provided Plaintiff with a redaction log. The redaction log was sent via mail to Plaintiff's counsel on May 29, 2008. For your convenience, I am enclosing another copy.

Third, I would like to respond to your attempt to meet and confer with regard to Request for Production Nos. 2, 3-12, and 26 to All Risks and Requests for Production Nos. 1-2, 8-9, 11, and 13-17 to McGrath. To start, this meet and confer attempt is both untimely and redundant. All Risks served its responses to Plaintiff's Request for Production on February 13, 2008. On February 29, 2008 –

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Dylan B. Carp
Mark S. Askanas
June 9, 2008
Page 2

more than three months ago, Plaintiff's counsel sent a letter requesting a telephone call to meet and confer on various Request for Production. On March 18, 2008, I participated in a lengthy conference call with Mr. Stern of Fulbright & Jaworski wherein we discussed the Requests for Production that were of concern to Plaintiff, some of which are identified in your recent letter. All Risks articulated its position with regard to these requests and did not agree to produce any additional documents.

Subsequently, on April 5, 2008, I later participated in another meet and confer session with Matthew Bobb with regard to Request for Production No. 5. At the conclusion of this conversation, All Risks agreed to produce additional responsive documents to Request for Production No. 5. No further meet and confer discussions were ever initiated by Plaintiff with regard to these Requests for Production. Moreover, All Risks has since provided the additional documents it agreed to produce pursuant to my meet and confer discussions with Mr. Bobb. There is nothing additional to be produced. As such, All Risks and McGrath have already sufficiently met and conferred with Plaintiff on these requests. Any attempt to meet and confer further or move to compel regarding these requests at this late time would be burdensome and harassing in addition to untimely pursuant to Federal Rule of Civil Procedure 5(d)(1).

Depositions of Messrs. Benkelman and Jennings

As a preliminary matter, Defendants believe these depositions are both relevant and necessary. These depositions are relevant as they go to the issue of Defendants' fourth affirmative defense (unclean hands) in terms of the conduct of Crump when hiring a broker from a competitor. Moreover, these depositions will address what is the industry standard and practice for brokers who move from one company to another. Accordingly, there is no basis to either quash the subpoena of Mr. Benkelman or move for a protective order regarding Mr. Jennings. Please let me know if you would like to further meet and confer about this issue.

With regard to Mr. Jennings' location, we can re-notice his deposition for New York. We are also, within the time constraints of this week, agreeable to working on time period for his deposition as well as the depositions of Benkelman and Hargrove that are convenient for all parties.

Finally, it appears as though my email address is susceptible to error. My email address is kwilliams@cdhklaw.com (please note that it is cdhklaw.com and that there is no "s" in the email address). However, it is our practice – and preference – to correspond with opposing counsel by letter or telephone. We find that these methods, though more formal in nature, lead to fewer misunderstandings or miscommunications amongst counsel. Thank you for your anticipated cooperation in this.

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Page 3

We look forward to working with you on this matter. Please do not hesitate to contact me with any questions.

Very truly yours,

Kristen L. Williams
Kristen L. Williams

KLW/ap
Enclosures

CRUMP INSURANCE SERVICES, INC.

v.

MICHAEL P. MCGRATH, et al.

United States District Court – Northern District – Case No. C-07-4636 MMC

DEFENDANTS' MICHAEL P. MCGRATH and ALL RISKS, LTD. REDACTION LOG

DOC. NO.	DATE	DESCRIPTION	REASON FOR REDACTION
ALL000006	05-02-2007	Email between Matt Nichols and Nick Cortezi	Privacy rights of third parties not party to this litigation – redacted
ALL000007	05-02-2007	Email between Matt Nichols and Nick Cortezi	Privacy rights of third parties not party to this litigation – redacted
ALL000009	05-22-2007	Email between Michael McGrath and Nick Cortezi	Privacy rights of third parties not party to this litigation & Confidential and proprietary information – redacted
ALL000010	05-07-2007	Email between Michael McGrath and Nick Cortezi	Privacy rights of third parties not party to this litigation – redacted
ALL000012	05-22-2007	Email between Michael McGrath and Nick Cortezi	Privacy rights of third parties not party to this litigation & Confidential and proprietary information – redacted
ALL000013	05-22-2007	Email between Michael McGrath and Nick Cortezi	Privacy rights of third parties not party to this litigation & Confidential and proprietary information – redacted
ALL000014	05-22-2007	Email between Michael McGrath and Nick Cortezi	Privacy rights of third parties not party to this litigation & Confidential and proprietary information – redacted
ALL000015	05-07-2007	Email between Michael McGrath and Nick Cortezi	Privacy rights of third parties not party to this litigation – redacted
ALL000016	05-18-2005	Email between Matt Nichols and Dawn D'Onofrio	Privacy rights of third parties not party to this litigation – redacted
ALL000018	05-23-2007	Email between Nick Cortezi and Matt Nichols	Privacy rights of third parties not party to this litigation & Confidential and proprietary information – redacted

DOC. NO.	DATE	DESCRIPTION	REASON FOR REDACTION
ALL000019	05-23-2007	Email between Nick Cortezi and Matt Nichols	Confidential and proprietary information – redacted
ALL000019	05-22-2007	Email between Michael McGrath and Nick Cortezi	Privacy rights of third parties not party to this litigation & Confidential and proprietary information – redacted
ALL000020		Email from Nick Cortezi to Michael McGrath	Privacy rights of third parties not party to this litigation – redacted
ALL000020	05-07-2007	Email from Michael McGrath to Nick Cortezi	Privacy rights of third parties not party to this litigation – redacted
ALL000025	06-05-2007	All Risks Employment Application	Privacy rights Defendant McGrath – redacted